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MEMO ENDORSED

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January 5, 2016

VIA ECF

Hon. Ronnie Abrams
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Courtroom 1506
New York, NY 10007

Application granted. It is hereby
ORDERED that Defendants' deadline to
answer or otherwise respond to Plaintiff's
Complaint is extended to January 29,
2016.

Hon. Ronnie Abrams, U.S.D.J.

1/5/2016

RE: Roberts v. Bliss et al., Case No. 15-cv-10167 (RA)

Dear Judge Abrams:

We represent Defendants TGI Friday's, Inc. and Made Movement LLC in the above-entitled matter. We write with consent of all parties to request that the Court enter an order extending all Defendants' time to answer or otherwise respond to Plaintiff's complaint through and including January 29, 2016. This is Defendants' first request for additional time to respond to the complaint.

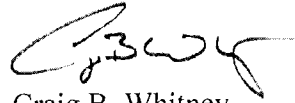
Plaintiff originally filed the complaint in this action in New York Supreme Court, No. 157085/2015, on December 1, 2015. On December 18, 2015, the parties agreed to extend all Defendants' time to respond to the complaint through January 29, 2016. A copy of the stipulation filed in the state court action is attached hereto as Exhibit A. Thereafter, Defendants timely removed the action to this Court by filing their Notice of Removal on December 31, 2015. See Dkt. No. 1. The parties were notified yesterday afternoon that the matter was assigned to Your Honor.

Pursuant to Fed. R. Civ. P. 81(c)(2)(C), Defendants are permitted seven days after the notice of removal is filed to answer or respond to the complaint, which would set the response deadline for this Thursday, January 7, 2016. The parties seek a modest extension of that time, until January 29, 2016, to maintain the previously agreed-upon schedule.

Hon. Ronnie Abrams
United States District Judge
January 5, 2016
Page 2 of 2

Based on the foregoing, Defendants respectfully request that this Court grant their unopposed motion for an order extending all Defendants' time to answer or otherwise move in response to the complaint in this action through and including January 29, 2016.

Respectfully submitted,



Craig B. Whitney

Enclosure

cc: Kevin W. Goering, Esq. (via email and overnight delivery)
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